

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA	*	
PLAINTIFF,	*	CV-05-1086-WKW
VS.		
	*	
	*	
EIGHTY THOUSAND SIX HUNDRED		
THIRTY-THREE DOLLARS	*	
(\$80,633.00) IN UNITED STATES CURRENCY;		
FOUR THOUSAND EIGHT HUNDRED	*	
SEVENTY-EIGHT DOLLARS (\$4,878.00)		
IN UNITED STATES CURRENCY; AND*		
THIRTY-SIX THOUSAND		
FIVE HUNDRED DOLLARS (\$36,500) IN *		
UNITED STATES CURRENCY	*	
DEFENDANTS.	*	
	*	

REQUEST FOR PRODUCTION OF DOCUMENTS

Comes now the defendant in the above styled case, by and through counsel, and pursuant to the Federal Rules of Criminal Procedure, the Fifth, Sixth and Fourteenth Amendments to the United States Constitution, and Brady v. Maryland 386 U.S. 66 (1967); Giglio v. United States 405 U.S. 150 (1970); United States v. Agurs, 427 U.S. 97 (1976); United States v. Valenzuela-Bernal 458 U.S. 858 (1982); California v. Trombetta 467 U.S. 749 (1984), and United States v. Bagley 473 U. S. 667 (1985) and their progeny, request the United States of America:

1. To produce and permit the defendant to inspect and copy any written or recorded statements made by the defendant to any law enforcement officer, official or employee which are within the possession, custody or control of the State of Alabama, the existence of which is known to the U.S. Attorney.
2. To produce and permit the defendant to inspect and copy any written or recorded statements made by co-defendants or accomplices, which is in the possession of custody or control of the Government, the existence which is known to the U.S. Attorney and which the Government intends to offer into evidence at trial.
3. To disclose to the defendant the substance of any oral statement made by the defendant before and after arrest to a law-enforcement official, official or employee whom the Government intends to offer into evidence at trial.
4. To produce and permit the defendant to analyze, inspect and copy or photograph each of the following which are within the possession custody or control of the State and which are material to the defendant's defense.
 - (A). Photographs, tape recordings, video tape recordings, or any other form of audio or visual reproduction as well as written statements by any of the parties to this action.
5. To produce and permit the defendant to inspect and copy the names and addresses of qualified mental health experts or professionals who have personally examined the defendant or any evidence in this case.

6. To produce and permit the defendant to inspect and copy and all reports made in connection with this case, which are within the possession or custody or control of the State and whose existence is known to the U.S. Attorney.

Respectfully Submitted,

/s/ Joe M. Reed
Joe M. Reed (REEO45)
Attorney for Defendant

Address of Counsel:
Joe M. Reed, Esq.
524 South Union Street
Montgomery, Alabama 36104
(334) 834-2000 Tel.
(334) 834-2088 Fax

Certificate of Service

I hereby certify that the foregoing was filed with the United States District Clerk, Middle District of Alabama who will send electronic notification to the Honorable John Harmon, Assistant United States Attorney, P.O. Box 197, Montgomery, AL 36101.

/s/ Joe M. Reed
Joe M. Reed